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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**DECLARATION OF
DANIEL AYALA IN SUPPORT OF
DEBTOR'S OMNIBUS REPLY TO:
(A) OBJECTION OF BRINK'S
INCORPORATED TO CONFIRMATION OF
DEBTOR'S CHAPTER 11 PLAN AND
RESERVATION OF RIGHTS; AND
(B) ENIGMA SECURITIES LIMITED'S
RESERVATION OF RIGHTS WITH
RESPECT TO CONFIRMATION OF PLAN**

Hearing Date: July 27, 2023

Hearing Time: 1:30 p.m.

I, Daniel Ayala, declare as follows:

1. I am the Independent Director of Cash Cloud, Inc. dba Coin Cloud ("Debtor"), debtor and debtor in possession in the above-captioned case (the "Chapter 11 Case").

2. Except as otherwise indicated herein, this Declaration is based upon my personal knowledge. I am over the age of 18 and am mentally competent. If called upon to testify, I would

1 testify competently to the facts set forth in this Declaration.

2 3. I make this Declaration in support of Debtor's *Omnibus Reply* to: (A) the *Objection*
 3 *of Brink's Incorporated to Confirmation of Debtor's Chapter 11 Plan and Reservation of Rights*
 4 [ECF No. 838] (the "Brink's Objection") filed by Brink's Incorporated ("Brink's"); and (B) *Enigma*
 5 *Securities Limited's Reservation of Rights with Respect to Confirmation of Plan* [ECF No. 834] (the
 6 "Enigma Reservation") filed by Enigma Securities Limited ("Enigma"), both with respect to
 7 confirmation of *Debtor's Chapter 11 Plan of Reorganization Dated May 8, 2023* [ECF No. 528]
 8 (the "Plan").¹

9 4. Brink's argues next that the liquidation analysis attached as Exhibit B to the
 10 *Supplement to [the Plan]* [ECF No. 821] shows that the projected administrative expense claims
 11 exceed the amount of sale proceeds [see ECF No. 795], and therefore the Plan cannot be confirmed
 12 in compliance with section 1129(a)(9) of the Bankruptcy Code. For this reason, among others,
 13 Debtor intends to file an Amended Plan that will make the Effective Date contingent upon Debtor
 14 having enough Cash assets to pay all administrative expense claims in full. Debtor and the
 15 Committee are in discussions with Debtor's secured creditors regarding modification of the Plan's
 16 treatment of their claims in light of the sale, and intend to file the Amended Plan (and continue the
 17 confirmation hearing) shortly.

18 I declare, under penalty of perjury of the laws of the United States of America, that the
 19 foregoing statements are true and correct to the best of my knowledge, information and belief.

20 Executed this 20th day of July 2023.

21
 22 /s/Daniel Ayala
 Daniel Ayala

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 28 ¹ Capitalized terms not defined herein have the meanings ascribed to them in the Plan.